

APPENDIX A**1. DISPUTED TERMS****a. '157 Patent**

Disputed Term	Facebook's Construction	Defendants' Construction
Item	<p>Ordinary meaning: an object, thing, or unit that can be configured</p> <p>Claims 1, 12, 13, 22</p> <p>Cols. 3:3-6; 5:40-59; 5:56-59; 10:3-7; 11:5-7</p> <p>Merriam-Webster's Collegiate Dictionary (10th ed. 1998) at 623</p> <p>Collins English Dictionary (4th ed. 1998) at 817</p> <p><i>Wireless</i> tr. at pp. 3-24</p>	<p>A physical object which can be operated, and is separate and distinct from the computer-implemented method (claim 1), system (claims 12 and 13), or computer-readable medium (claim 22) configuring the object</p> <p>Claims 1, 12, 13, 22</p> <p>Abstract, Detailed Description</p> <p>Cols. 1:7-12; 1:62-65; 2:66-3:2; 5:40-59; 5:56-59.</p>
Optional component	<p>A part or portion of an item that may or may not be selected</p> <p>Claim 1</p> <p>Cols. 5:40-53; 11:5-7</p> <p><i>Wireless</i> tr. at pp. 24-46</p> <p>Collins English Dictionary (4th ed. 1998) at 342, 1131</p> <p>Webster's Third New International Dictionary of the English Language at 466</p> <p>Goel Decl., Ex. C at FBPMC00001851, 1869</p> <p>Goel Decl., Ex. E at FBPMC00001878</p> <p>Goel Decl., Ex. F at FBPMC00001927; 1946</p>	<p>A constituent part of an item that can be selected by a user</p> <p>Claim 1</p> <p>Abstract</p> <p>Cols. 1:7-11; 2:18-21; 2:28-32; 2:54-59; 4:1-5; 4:41-43; 4:48-59; 5:40-53; 9:16-19</p> <p>Webster's Third New International Dictionary of the English Language at 466</p> <p>Goel Decl., Ex. C at FBPMC00001851, 1869</p> <p>Goel Decl., Ex. E at FBPMC00001878</p> <p>Goel Decl., Ex. F at FBPMC00001927; 1946</p>

Disputed Term	Facebook's Construction	Defendants' Construction
Options	<p>Data that corresponds to optional components of an item</p> <p>Claim 1</p> <p>Cols. 2:36-38; 2:56-61; 4:64-67; 5:17-31; 6:18-23; 8:40-52; 8:60-65</p> <p><i>Wireless</i> tr. at pp. 26-29, 31</p>	<p>Option - Data representing an optional component of an item</p> <p>Claims 1, 12, 13, 22</p> <p>Abstract</p> <p>Cols. 2:31-34</p>
Hierarchical option tree	<p>An organizational framework for two or more options wherein one option sits at a higher level and branches into at least one other option</p> <p>Claims 1, 3-5, 15-17, 24-26</p> <p>Cols. 10:20-29; 10:25-30; 4:19-22; 4:64-67; 6:23-28; 11:5-7</p> <p>Figs. 1, 2, 3</p> <p><i>Wireless</i> tr. at pp. 37-40</p> <p>Facebook's op. br. in <i>Wireless Ink</i> at 15.</p>	<p>A visual presentation of options in a tree based on parent/child functional relationships among those options</p> <p>Claims 1, 12, 13, 22</p> <p>Abstract</p> <p>Fig. 1; Fig. 2</p> <p>Cols. 2:4-9; 2:47-51; 3:18-19; 4:19-22; 4:60-64; 4:64-67; 6:23-28; 10:9-11; 10:20-31.</p> <p>Goel Decl., Ex. C at FBPMC00001864</p>
Instance creation file	<p>A computer-readable collection of stored information representing the one or more selected options</p> <p>Claim 12</p> <p>Cols. 6:67 - 7:4; 8:4-7; 8:25-26</p> <p>Fig. 6</p> <p><i>Wireless</i> tr. at pp. 40-44</p>	<p>A complete, stored collection of item-specific information that contains the instances and attributes for a user's configuration of an item</p> <p>Claims 1, 12, 13, 22</p> <p>Goel Decl., Ex. A ('157 Prosecution History) at FBPMC00000098-104.</p> <p>Fig. 4.</p>

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	Facebook's op. br. in <i>Wireless Ink</i> at 13-14	Cols. 1:38-42; 6:48-58; 6:62-64; 6:67-7:4; 7:6-12
Configuration selector	<p>A structure that allows selection of one or more options from the option tree Cols. 8:17-24; 9:46-50; 11:8-18 <i>Wireless</i> tr. at pp. 48-55 Facebook's op. br. in <i>Wireless Ink</i> at 23-24 Collins English Dictionary (4th ed. 1998) at 1395</p>	<p>Function: allowing a user to select one or more options from the option tree Claim 12 Structure: Setup Application 822 of Fig. 8 and the algorithm contained in Col. 9, lines 16-19 and lines 46-50 Cols 9:16-19, 9:46-50</p>
Configuration generator	<p>A structure that implements at least one attribute corresponding to selected options and places attributes into an instance creation file Cols. 6:30-47; 6:48 - 7:4; 8:8-16; 8:25-30; 11:8-18 Fig. 3 <i>Wireless</i> tr. at pp. 48-55 Facebook's op. br. in <i>Wireless Ink</i> at 23-24 Collins English Dictionary (4th ed. 1998) at 639</p>	<p>Function: implementing at least one attribute corresponding to a selected option and placing that attribute into an instance creation file Structure: Indefinite Claim 12</p>
Editor	<p>A structure that creates attributes and associates attributes with two or more options Cols. 9:20-45; 10:9-45; 11:8-18 Figs. 8, 9A, 9B <i>Wireless</i> tr. at pp. 48-55</p>	<p>Function: creating attributes and associating those attributes with options Structure: Building Block Editor 812 of Fig. 8 and the algorithm contained in Col. 9, lines 29-33</p>

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	Collins English Dictionary (4th ed. 1998) at 493	Fig. 8 Cols. 9:29-33

b. '458 Patent

Disputed Term	Facebook's Construction	Defendants' Construction
Request for service	Ordinary meaning: request for performance of one or more processes by one or more applications Cols. 4:51-59; 5:28-47 Figs. 5, 6	A call to a server application for execution of an application program that could modify database data Claims 1, 2, 3, 11, 12, 13 Abstract Cols. 1:66-2:6, 2:25-27; 2:25-40.
Database change notice	An indication generated upon modification of database data that causes a browser to update data to reflect the modification Claims 1, 3, 6, 8, 11, 13 Abstract Cols. 2:25-40; 2:49-51; 5:4-6; 6:20-21; 6:23-26; 6:64-67 Collins English Dictionary (4th ed. 1998) at 1736	A server-initiated notification that database data was updated by a browser after execution of an application program Claims 1-5, 11-13 Abstract Cols. 1:66-2:6; 2:25-40
Security server	A server which is capable of identifying users currently requesting service of the network resource and, upon a change of the database data, transmitting a database change notice	A server controlling access to the database that requires all client browsers requesting access to the database to sign on or register with it before access to the database is granted

Disputed Term	Facebook's Construction	Defendants' Construction
	Claims 1, 2, 11, 12, 13 Col. 6:23-50	Claim 1, 2, 11, 12, 13 Cols. 2:42-45
Mechanism	Ordinary meaning: process Claims 11, 12, 13 Col. 4:55 – 5:3 Fig. 4 Merriam-Webster's Collegiate Dictionary (10th ed. 1998) at 721 Collins English Dictionary (4th ed. 1998) at 965-66 Microsoft Press Computer Dictionary (3rd ed. 1997) at 383	A separate and distinct portion Claims 11, 12, 13
Application mechanism	No construction necessary	A separate and distinct portion of an application Claim 11
Security server mechanism	No construction necessary	A separate and distinct portion of a security server Claims 12, 13

2. AGREED UPON TERMS

a. '157 Patent

Term	Agreed Upon Construction
Configuring an item	Preparing an item for use such that it contains desired optional components
Attribute	Data that represents a characteristic of an optional component associated with at least one option
Characteristics	Features, properties, or qualities of the optional components

b. '458 Patent

Term	Agreed Upon Construction
Browser	Client application that enables a user to navigate the Internet and view HTML documents on the WWW, another network, or the user's computer
Database	An application for maintaining data in an organized fashion
Database data	Data managed and/or maintained by a database.
Application server	A server which is capable of running software applications and sending a database change notice, upon a change to data within a database
Retransmission to the plurality of browsers/retransmitting the database change notice to the plurality of browsers/retransmits the database change notice to the plurality of browsers	Sending the same database change notice that was received by the security server to the plurality of browsers